

FELICELLO

Michael James Maloney*
Partner

Felicello Law P.C.
366 Madison Avenue
3rd Floor
New York, NY 10017

Tel. +1 (646) 564-3510
mmalone@felicellolaw.com

June 21, 2021

VIA ECF

Hon. Victor Marrero
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-DCF
(S.D.N.Y.)

Dear Judge Marrero:

We represent Defendant Vincent Wenyong Shi (“Shi”). On June 9, 2021, Plaintiff Wayne Baliga (“Plaintiff”) filed an Objection (Dkt. No. 223 refiled at Dkt. No. 225, the “Objection”) to the Memorandum Order issued by the Hon. Debra Freeman on May 26, 2021 (Dkt. No. 221). We write to respectfully request an extension of Shi’s time to respond to the Objection from June 23, 2021 to July 9, 2021.

Counsel for Robert W. Seiden, the court-appointed receiver for Link Motion Inc., consents to this request. Counsel for Plaintiff have advised that they do not oppose this request. Accordingly, Shi respectfully requests that the Court grant this request for an extension.

Respectfully submitted,

/s/ Michael James Maloney

Michael James Maloney

cc: All counsel of record (via ECF)